



USDC SDNY
DOCUMENT

ELECTRONICALLY FILED

DOC #:

FILED: 5/13/25

U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

May 12, 2025

BY ECF

The Honorable Colleen McMahon
United States District Judge
500 Pearl Street
New York, NY 10007

Re: *Knight First Amendment Institute v. Central Intelligence Agency, et al.*,
22 Civ. 1542 (CM)

Dear Judge McMahon:

This Office represents the defendant agencies in this Freedom of Information Act (FOIA) case. We write jointly with counsel for plaintiff to provide a status report, as directed by the Court's previous order, ECF No. 67.

As we noted in our last status report, the parties agree that the merits of this action are now resolved, and the only remaining issue is plaintiff's claim for attorneys' fees and costs. On April 30, plaintiff provided the government with a demand and supporting time records. The government is now evaluating the demand and determining its response. In order to provide the parties sufficient time to discuss the demand and determine whether it is possible to resolve the claim without further litigation, we respectfully propose filing a further status report in two months, or by July 11, 2025.

We thank the Court for its attention to this matter.

Respectfully submitted,

JAY CLAYTON
United States Attorney
Southern District of New York

By: /s/ Peter Aronoff
PETER ARONOFF
Assistant United States Attorney
Telephone: (212) 637-2697
E-mail: peter.aronoff@usdoj.gov

Counsel for defendants

cc: Counsel for plaintiff (via ECF)